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*Attorneys for Defendant  
Bank of America, N.A.*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In Re:

Carolle Bordes

Carolle Bordes,

Plaintiff,

- against -

Bank of America, N.A.,

Defendant.

Chapter 13

Case No.: 09-24257 (RDD)

Adv. Pro. No.: 10-08216 (RDD)

### **JOINT DISCOVERY CONTROL PLAN**

The parties in the above captioned adversary proceeding file this Joint Discovery Control Plan in accordance with the Court's direction at the initial pretrial conference on April 16, 2010 and respectfully state as follows:

1. (A) The parties will serve Rule 26 Disclosures by May 4, 2010.
- (B) The parties have presently not determined whether they shall employ expert witnesses. However, each party has reserved their respective rights to call expert witnesses.
- (C) The parties have agreed that all discovery shall be completed on or before July 15, 2010.

(D) The parties estimate that they shall require one day to present their evidence, and argument at trial.

(E) Pursuant to the Court's direction, the parties will contact chambers and request a trial date on or around August 15, 2010

(F) Pursuant to the Court's direction, all motions for summary judgment shall be made by August 1, 2010.

LAW OFFICE OF BLEICHMAN &  
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SO ORDERED  
THIS 3d DAY OF May, 2010

/s/ Robert D. Drain  
Honorable Robert D. Drain  
United States Bankruptcy Judge